

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

KENNETH I. STRANGE,

Plaintiff,

v.

DDN/OBERGFEL, LLC,

Defendant.

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CIVIL ACTION NO. AMD-00-1920

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff, Kenneth I. Strange, and Defendant, DDN/Obergfel, LLC, by their undersigned attorneys, hereby request that this Court extend the discovery deadline to and including January 19, 2001. Both parties have consented to this Motion, pursuant to Local Rule 105.9(a).

The parties state the following as reasons for their joint request:

1. The present discovery deadline is November 20, 2000. See July 10, 2000 Scheduling Order.
2. The parties have worked diligently and in good faith to complete discovery by the November 20, 2000 deadline, but will be unable to do so. The parties also have engaged in initial settlement discussions and anticipate that these discussions will continue. The parties may request that the Court refer this case to a Magistrate Judge for settlement/ADR purposes.

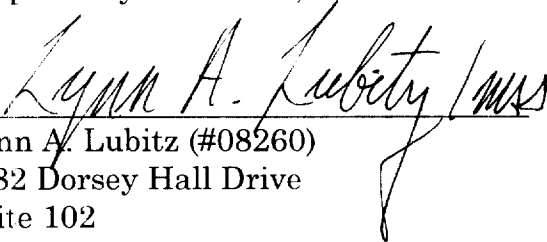
3. Both parties consent to the extension requested herein and confirm that this extension will not prejudice either party.

4. The only other deadlines scheduled in this case are the deadlines for Requests for Admissions and Dispositive Pretrial Motions, presently scheduled for November 27, 2000 and December 19, 2000, respectively. The parties hereby request that these deadlines be extended to and including January 26, 2001, and February 19, 2001, respectively. No other deadlines have been scheduled in this case.

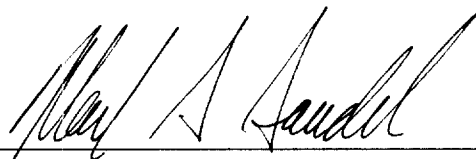
5. The parties anticipate that the requested extension of the discovery deadline will be adequate to complete all discovery.

Wherefore, the parties respectfully request that the Court grant their Joint Request to Extend the Discovery Deadline, to and including Monday, January 19, 2001.

Respectfully submitted,


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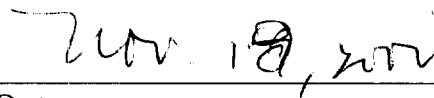
Counsel for Defendant
DDN/Obergfel, LLC

Date: November 17, 2000

APPROVED:



Andre M. Davis
United States District Judge



Date